

Integrated Resource Planning (R.20-05-003)

2022 IRP Filing Requirements

Filing Requirements Overview

1. Background:

In accordance with Decision (D.) 18-02-018, and D.22-02-004, all Load Serving Entities (LSEs) subject to the Commission's Integrated Resource Planning (IRP) process are required to file and serve their individual IRPs with the CPUC. For the 2022 IRP Filings, LSEs are required to do so by no later than November 1, 2022.

Three Filing Requirements documents are posted on the CPUC website to assist individual LSEs in preparing their individual IRPs for Commission review. The three documents include: the Narrative Template (NT), the Resource Data Template (RDT), and the Clean Power System (CSP) Calculator.

Each LSE should fully and accurately complete the three documents for this current IRP cycle in a way that adheres to filing requirements standards and the instructions described in this document and within the NT, RDT, and CSP templates and user guides. Failure to do so may subject the LSE to penalty under the IRP Citation Program.

2. Purpose:

This document guides LSEs and provides an overview of the Filing Requirements documents that LSEs are required to use, as well as how these documents fit together. It also defines the key concepts for plan development and IRP filing. Finally, it instructs LSEs on how to file their plans with the CPUC.

3. Narrative Template:

In this document, each LSE shall describe to the Commission and interested stakeholders its plan development approach, results of analytical work, and the LSE's action plan.

Completeness of the Narrative Template will be defined by:

- Complete responses to each section.

- For the sections that are not applicable to the LSE, they should indicate "Not applicable" and provide an explanation.

The LSE must provide all requested information in all applicable Narrative Template sections. If the LSE fails to address any specific Narrative Template section requirements, Energy Division staff may request Narrative Template re-submissions. Furthermore, Narrative Template sections 3(b), 3(d), 3(e), 4(a), and 4(b) will be graded using a scorecard system to be published in the Preferred System Plan, which will grade those sections as:

- Exemplary – response reflects surpassing requirements and potentially setting a standard for future best practices for other LSEs to emulate.
- Adequate – response reflects a satisfactory fulfillment of the individual requirement; this score indicates that the LSE provided all of the required information.
- Deficient – response reflects a failure to meet the requirement or answer the question included in the template or in the statutory language that underlies the filing requirement.

An LSE receiving deficient scores in any section will be required to formally file supplemental Narrative Template information after Preferred System Plan adoption in the IRP proceeding.

4. Resource Data Template:

The Resource Data Template (RDT) is for the LSE to report its existing and planned energy and capacity contracts. Commission Staff has provided instructions for using this template in its user guide document (RDTv3 User Guide). The LSE should review this document before entering data in the RDT.

1. **Cutoff date:** For purposes of determining the contract status, use September 1, 2022, as the cutoff date.
2. **Error checking macro:** Staff developed an error checking macro as part of RDTv3, based on the rules and relationships spelled out in the user guide. LSEs need to trace the errors identified by the macro and correct them before submitting.
3. **Contracts to include:** Enter only contracts with delivery dates that are inclusive of January 2023 or later and contract end dates of January 1, 2024, or later. A contract that will deliver in 2023 but ends before 2024 should not be included in an LSE's RDT.
 - a. Please note that this guidance does not apply to resources being procured to meet an LSE's D.19-11-016 procurement obligation. LSEs should still report any D.19-11-016 resources, even those contracts that end in 2023.
4. **Instruction on IRP D.19-11-016, D.20-12-044, and D.21-06-035 requirement:** Please include all IRP procurement order resources in this filing that were included in your August 2022 IRP compliance filing. Please update the status of these resources per the cut-off date included in this document. The user guide includes detailed information on

how to indicate these resources in your RDTv3 and any columns that are specific to these resources. As this is not an IRP procurement compliance filing, no supplemental documentation should be submitted with this filing. All supplemental documents are due with the August 2022 filing.

Completeness of the Resource Data Template will be defined by:

- The LSE should enter its contracts in the “unique_contracts” tab and provide all the necessary information for each contract following the instructions in this document and the RDTv3 User Guide
- No errors are presented in the “ReportSheet” tab
- The perfect capacity equivalent MW of the LSE's resources in the "Reliability" tab is equal to or greater than the LSE's reliability need, in each year of the planning horizon.

5. Clean System Power Calculator:

This calculator tool is for the LSE to use in estimating the GHG and criteria pollutant emissions of its portfolios. Commission Staff has provided instructions for using this calculator within the document template. The LSE is required to demonstrate the use of the CSP method and calculator tool in accounting for emissions in its portfolios. The LSE is also free to use other tools to inform or supplement this accounting method. Importantly, the calculator is not intended to be used as an after-the-fact compliance tool, but rather to provide all LSEs a simple and uniform way of estimating the emissions associated with their IRP portfolios. LSE supply inputs to the CSP calculator are based on RDT outputs to ensure consistency between filing requirement documents in LSE plans.

Completeness of the Clean System Power Calculator will be defined by:

- The LSE should input values in the yellow cells in the Demand Inputs, the Supply Inputs, and, for ESPs, the ESP GHG Benchmark tabs.
- In the Demand Inputs tab, the LSE enters its annual managed sales load forecast for each of the modeling years in the “Managed Retail Sales Forecast (assigned to LSE)” row that matches its IRP-assigned annual load forecast and its behind-the-meter photovoltaic (BTM PV) forecast for each of the modeling years in the “BTM PV Forecast (assigned to LSE)” row.
 - If an LSE chooses to enter a custom hourly demand shape, the shape is normalized so that the sum of the hourly values over the entire year equal 1 and the check on row 38 equals TRUE. The LSE must also provide a detailed explanation as to how their load shape was developed in the Narrative Template.

- If an LSE chooses to specify a percentage of their baseline demand that comes from C&I loads, the percentage of C&I load does not exceed 100% and the check on row 40 equals TRUE. The LSE must also provide a detailed explanation as to how their load shape was developed in the Narrative Template.
- If an LSE chooses to override components of their demand forecast for an Alternative Portfolio, custom demand inputs are grossed up for T&D losses before they are entered, the correct sign (positive/negative) on demand inputs are used, and the check on row 39 equals TRUE. The LSE must also provide a detailed explanation as to how their alternate load modifier assumptions were developed in the Narrative Template.
- In the Supply Inputs tab, the LSE Respondent enters only supply from its contracted and planned resource portfolio where power output is delivered to (1) a California Balancing Authority area, if RPS-eligible, or (2) the CAISO system if the resource is not RPS-eligible. Other inputs in this tab must also meet the following criteria:
 - The supply input resource entries are pasted directly from the “CSPReportSheet” tab of the RDT for the same portfolio.
 - All entered RPS-eligible resources are RPS PCC 1 or meet the criteria to qualify as RPS PCC 1 except for the contract execution date.
 - If an LSE Respondent chooses to enter a User-Specified RPS Resource or User-Specified GHG-free non-RPS Resource Custom Profile, the total annual energy output matches the sum of the hourly energy production profiles provided in each year for those categories
 - If an LSE Respondent chooses to enter a User-Specified Storage Resource Custom Profiles, the hourly production profile ranges between -1 (charging at max) to 1 (discharging at max) and is normalized to the contracted_nameplate_capacity for the resource. In addition, the hourly profile should not be a net producer of energy and will likely be a net consumer of energy as a result of round-trip efficiency losses from storage.
- In the ESP GHG Benchmark tab, an ESP utilizes the load forecast that has been confidentially communicated to it by Energy Division staff.

6. Required and Optional Portfolios:

LSEs must produce and submit at least two “Conforming Portfolios:” one that achieves emissions that are equal to or less than the LSE’s proportional share of the 38 MMT by 2030 and 30 MMT by 2035 GHG targets (the 30 MMT conforming portfolio), and another that achieves emissions that are equal to or less than the LSE’s proportional share of the 30 MMT by 2030 and 25 MMT by 2035 GHG targets (the 25 MMT conforming portfolio). A definition of “Conforming Portfolio” is provided below. LSEs may study and report multiple “Conforming Portfolios” for each GHG target.

LSEs are required to select two "Preferred Conforming Portfolios" among all "Conforming Portfolios" developed and submitted: one that achieves emissions that are equal to or less than the LSE's proportional share of the 38 MMT by 2030 and 30 MMT by 2035 GHG targets (the 30 MMT preferred conforming portfolio), and another that achieves emissions that are equal to or less than the LSE's proportional share of the 30 MMT by 2030 and 25 MMT by 2035 GHG targets (the 25 MMT preferred conforming portfolio). LSEs should justify the selections for each GHG target, including why the portfolio is consistent with all state goals and is the best representation for how the LSE plans to meet state goals. If the LSE intends to go below its proportional share of both the 2030 30 MMT target and the 2035 25 MMT target, then that LSE will only be required to submit one Preferred Conforming Portfolio as part of its individual IRP filing. However, LSEs submitting one Preferred Conforming Portfolio will still be required to submit that portfolio in each of the two required sets of Resource Data Templates and Clean System Power calculators required for each set of 2030/2035 GHG targets.

LSE may also study and report additional "Alternative Portfolios" developed from different assumptions (including different load and load modifier assumptions) from the 2021 Preferred System Plan with updates. For all "Alternative Portfolios" developed, any deviations from the "Conforming Portfolio" must be explained and justified. If the LSE uses different load and load modifier assumptions as part of any "Alternative Portfolio" the LSE should report that information using the standard IEPR filing form templates associated with that information.

A portfolio will be qualified as a conforming one if it meets the following criteria:

A. Utilizing the LSE's assigned load forecast

A portfolio will be considered conforming if it utilizes the LSE's assigned energy and peak demand load forecast and behind-the-meter photovoltaic (BTM PV) forecast developed pursuant to a June 15, 2022, ALJ Ruling and either posted to the Commission's IRP website or confidentially communicated to the LSE individually by Energy Division staff.

B. Load shape in CSP calculator

A portfolio will be considered conforming if, in the CSP calculator, the total annual energy volumes remain consistent with LSE's assigned load and load-modifying resource forecast and all checks in the "Demand Inputs" tab say "TRUE".

- An LSE may provide its own 8760 hourly shape for their customers' load and load-modifying resources as long as (1) the total annual energy volumes remain consistent with its assigned load and load-modifying resource forecast, and (2) the LSE provides a detailed explanation as to how its load shape was developed in the Narrative Template.

C. Custom Renewable, GHG-free, and Storage resource shapes in CSP calculator

A portfolio will be considered conforming if, in the CSP calculator, when an LSE enters a User-Specified Profile:

- For RPS Resource Custom Profiles and GHG-free non-RPS Resource Custom Profiles, the total annual energy output matches the sum of the hourly energy production profiles provided in each year.
- For Storage Resource Custom Profiles, the hourly production profile ranges between -1 (charging at max) to 1 (discharging at max) and is normalized to the contracted_nameplate_capacity for the resource. In addition, the hourly profile should not be a net producer of energy and will likely be a net consumer of energy as a result of round-trip efficiency losses from storage.
- An LSE may represent multiple resources under each of these categories by adding together the individual production profiles of each resource to create an aggregate 8760 shape representing the output of all resources they have chosen to represent with custom profiles as long as (1) for RPS Resource Custom Profile and GHG-free non-RPS Resource Custom Profile: the total annual energy amounts remain consistent with the total hourly energy amounts OR for Storage Resource Custom Profile: the sum of contracted_nameplate_capacity over all storage resources represented as CSP Storage Resource Custom Profile resources multiplied by the custom profile in the CSP tool represents the aggregate charging and discharging behavior from all CSP Storage Resource Custom Profile resources , and (2) the LSE provides a detailed explanation as to how its production shapes were developed in the Narrative Template.
- All checks in the “Supply Inputs” tab say “TRUE”

D. Conforming to the LSE's 2030 and 2035 GHG Emission Benchmarks

A portfolio will be considered conforming if it addresses the LSE’s proportional share of the GHG targets.

- A conforming portfolio for the 2030 38 MMT GHG target and 2035 30 MMT target needs to achieve emission equal to or less than the LSE’s proportional share of the 2030 38 MMT and 2035 30 MMT GHG targets, and a conforming portfolio for the 2030 30 MMT GHG target and 2035 25 MMT target needs to achieve emissions that are equal to or less than the LSE’s proportional share of a 2030 30 MMT and 2035 25 MMT target.

E. Conforming to the LSE’s reliability need in all years of the planning horizon

A portfolio will be considered conforming if the perfect capacity equivalent MW of their resources is equal to or greater than the LSE’s reliability need, in each year of the planning horizon.

F. Complete Narrative Template

A portfolio will be considered conforming if, in the Narrative Template, the LSE provides complete responses to each section providing requested qualitative and quantitative information about the portfolio.

G. Other inputs and assumptions

Uses inputs and assumptions consistent with those used by staff to develop the 2021 Preferred System Plan (PSP) with updates, with the following exceptions based on updated information:

- If the LSE has better capital cost and financing information that more accurately reflects its situation, the LSE is free to use those inputs and/or assumptions. For example, an LSE may have its own view of future resource levelized costs and it is free to use this information to develop its portfolio. LSEs should clearly identify, and provide an explanation for, instances where it used its own assumption in lieu of the default used by staff to develop the 2021 PSP with updates.

H. Completing all three filing documents

A portfolio will be considered conforming if it has all three filing documents (Resource Data Template, CSP calculator, and Narrative Template) completed according to completeness definition provided above.

7. Submission Date:

Each LSE must submit all materials to the CPUC by 5 PM on Tuesday, November 1, 2022.

8. Submission instruction:

- Informal Provision:** Please submit all filing requirements materials to irpdatarequest@cpuc.ca.gov through the CPUC FTP website. The LSE should file its filing requirements materials utilizing the instructions in this document and the Filing Requirements documents. LSEs may consider some information confidential and wish to file accordingly. In that case, LSEs need to submit two versions of the document (confidential and public). Filers who do not already have a CPUC secure FTP account should follow the instructions on the [secure FTP site](#). From within the secure FTP application, users can send secure emails to CPUC staff with large attachments. This mechanism allows filers to transmit their complete filing to CPUC staff including any portions deemed confidential.

Before submitting, please change each document's file name using the following naming convention:

- Narrative Template:** Please change the file name using the following naming convention. The file name must contain the 3 elements below, in the order provided. Use an underscore to separate them.
 - The LSE's abbreviation, provided in the Resource Data Template's workbook in the "lse_names" tab

- b. Confidential vs. Public: written as “confidential” or “public”
- c. Version number, written as the letter "v", followed by a number. If you have to re-submit a file for any reason, increase this number by 1.

For example, an LSE assigned the abbreviation “lse”, should use the name “lse_confidential_v1” for its confidential Narrative Template submission. The same LSE should use the name “lse_public_v1” for its public Narrative Template submission.

- II. Resource Data Template & Clean System Power Calculator: Please change the file names using the following naming convention. The file name must contain the eight elements below, in the order provided. Use an underscore to separate each element (i.e. the final file name should have seven underscores in it). All letters should be in lower-case.
- a. The LSE's abbreviation, provided in the Resource Data Template’s workbook in the “lse_names” tab
 - b. “rdtv3” or “csp”, as appropriate. Use “rdtv3” for Resource Data Template and “csp” for Clean System Power calculator.
 - c. "25mmt" or "30mmt", as appropriate, depending on the 2035 carbon target corresponding to the portfolio.
 - d. If portfolio is preferred, write "preferred", else write "na"
 - e. If portfolio is conforming, write "conforming", else write "na"
 - f. If portfolio is alternative, write "alternative," else write "na"
 - g. Confidential vs. Public: written as “confidential” or “public”
 - h. Version number, written as the letter "v", followed by a number. If you have to re-submit a file for any reason, increase this number by 1.

For example, LSE with the abbreviation “lse” could send the following Resource Data Template workbooks (although, at a minimum, they are required to send the first four, a preferred conforming each for 25 and 30 MMT both confidential and public versions):

1. lse_rdtv3_25mmt_preferred_conforming_na_confidential_v1.xlsx
2. lse_rdtv3_30mmt_preferred_conforming_na_confidential_v1.xlsx
3. lse_rdtv3_25mmt_preferred_conforming_na_public_v1.xlsx
4. lse_rdtv3_30mmt_preferred_conforming_na_public_v1.xlsx
5. lse_rdtv3_25mmt_na_conforming_na_confidential_v1.xlsx (this portfolio is conforming, but not preferred)
6. lse_rdtv3_30mmt_na_na_alternative_confidentialv1.xlsx

The same LSE could send the following outputs of Clean System Power calculator (although, at a minimum, they are required to send the first four, a preferred conforming each for 25 and 30 MMT both confidential and public versions):

1. lse_csp_25mmt_preferred_conforming_na_confidential_v1.xlsx

2. lse_csp_30mmt_preferred_conforming_na_confidential_v1.xlsx
3. lse_csp_25mmt_preferred_conforming_na_public_v1.xlsx
4. lse_csp_30mmt_preferred_conforming_na_public_v1.xlsx
5. lse_csp_25mmt_na_conforming_na_confidential_v1.xlsx (this portfolio is conforming, but not preferred)
6. lse_csp_30mmt_na_na_alternative_confidentialv1.xlsx

In addition, please also include the "LSE Contact Information Form". CPUC staff will contact the person(s) listed in this form for questions about LSE's filing.

b. Formal Filing: Parties should also read carefully and follow Rule 1.5 through 1.14 of the Commission's Rules of Practice and Procedure available here:

<http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M209/K618/209618807.PDF>

Below is a guide to the basic steps, in anticipation of the likely needs of many LSEs in this proceeding. This guidance is not intended to modify, in any way, the requirements set forth in the Commission's Rules of Practice and Procedure.

- **E-filing**
 - When making the formal filing, LSEs are encouraged to utilize the Commission's electronic e-filing system and select the document type "compliance filing."
 - When e-filed, documents must be PDF/A compliant (see Rule 1.13).
 - All materials should be e-filed, including PDF/A compliant versions of public spreadsheet materials, EIA forms, etc.
 - Filers should include the verification required by Rule 1.11.
 - Filers should also include a certificate of service (service requirements are discussed further below).
 - If a document is larger than 50 pages or 3.5 megabytes, the filer should instead file and serve a "notice of availability" with a link to the materials housed on its own web site in a publicly accessible format (see Rule 1.9(d)).
 - The filing deadline is November 1, 2022, before 5 p.m.
- **Confidential Materials**
 - The LSE should file all the filing requirements materials utilizing the instructions in this document and the Filing Requirements documents. LSEs will likely consider contractual information confidential and wish to file accordingly.
 - Along with the confidential version of its materials, the LSE will need to separately file a "motion to file under seal" detailing the justification for keeping the material confidential, following the guidance in the Commission's decision

D.06-06-066 for these purposes (see Rule 11.4; there is also detailed guidance contained on the following page on the Commission's Practitioner Page web site: <https://www.cpuc.ca.gov/about-cpuc/divisions/administrative-law-judges/practitioners-page>, look for link titled: "Filing Confidential Documents Under Seal (Rev. Nov 2013)).

- The confidential version of the LSE's materials may be submitted under seal in hard copy form, or if the material exceeds 3.5 megabytes, may be submitted on an archival DVD directly to the Docket Office. For more detailed guidance on this issue, also see the Practitioner's Page at <https://www.cpuc.ca.gov/about-cpuc/divisions/administrative-law-judges/practitioners-page>, look for link titled: "Mixed Media Filings: Cutting Edge Filing Techniques to Accommodate Multiple & Voluminous Media Formats."
- LSEs should also ensure that confidential materials are delivered to Commission staff electronically immediately, regardless of the formal filing status, so that staff can begin analysis (see details in 8.a).

- **Service of Materials**

- All public versions of filed materials should be served on all members of the "service list" of this proceeding (See Rule 1.13).
- The service list can be downloaded from the docket card for this proceeding or from the Commission's service list webpage, by clicking on "download comma-delimited file."
- Email service is generally preferred, but has some limitations:
 - Some email servers will not accept or deliver messages to groups of more than 100 addresses. Thus, serving the whole service list may require dividing up distribution into smaller groups of recipients.
 - Document size is also limited if serving by email, and thus a notice of availability with a public web site link is preferred for large documents and underlying materials. Such an approach will also make spreadsheet materials more accessible and useful.
- Service should be performed on the same day as filing, by November 1, 2022, before 5 p.m.
- If you have specific technical questions about this general formal filing guidance, you may contact the Commission's Docket Office at efile-help@cpuc.ca.gov or call (415) 703-2121.